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*ATTORNEYS FOR AGTEXAS FARM CREDIT SERVICES,  
AGTEXAS, PCA AND  
THORLAKSON DIAMOND T FEEDERS, LP*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., et al., <sup>1</sup>	§	CASE NO. 23-20084-RLJ-7
	§	
Debtors.	§	Jointly Administered

**WITNESS AND EXHIBIT LIST OF THORLAKSON DIAMOND T FEEDERS, LP**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

*THORLAKSON DIAMOND T FEEDERS, LP* (“Thorlakson”) files this Witness and Exhibit List for the hearing set for April 11, 2024 on Rabo’s Motion for Relief from Automatic Stay or, Alternatively, for Abandonment of Certain Cattle and Proceeds of Cattle [ECF No. 192] and would show the Court as follows:

**I.**  
**WITNESS LIST**

Thorlakson expects to call some or all of the following witnesses:

1. Tom Thorlakson
2. Lindsey Cybulskie;

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<sup>1</sup> The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

3. TSCRA Rangers;
4. Colton Young; and
5. All witnesses designated or called by other parties.

Thorlakson further reserves the right to call rebuttal or impeachment witnesses.

## **II.**

### **EXHIBIT LIST**

- A. Records from Lot 3651
- B. Emails from Glenn Karlberg to Kent Ries (Trustee) dated May 9, 2023; Texas & Southwestern Cattle Raisers Association (TSCRA) Law Enforcement Division Report of Investigation dated May 8, 2023 regarding 13 head of cattle belonging to Tom Thorlakson; TSCRA Certificate of Inspection dated April 19, 2023 for AgTexas (Tom Thorlakson); TSCRA Certificate of Inspection for Thorlakson Diamond T Feeders for 288 head (date is not legible); TSCRA Law Enforcement Division Report of Investigation dated April 20, 2023 related to 288 head of cattle belonging to Thorlakson Diamond T Feeder[s], LP
- C. Check stub dated January 5, 2024 from Keeling Cattle Feeders made to AgTexas representing proceeds from Lot 1854; Cattle Shipment Advice from Keeling Cattle Feeders dated December 14, 2023 for Lot 1854; Keeling Cattle Feeders Performance Record for Lot 1854; Keeling Cattle Feeders Comprehensive Yard Sheet dated August 23, 2023
- D. Email dated April 24, 2023 giving notice to Trustee of cattle at Keeling Cattle Feeders
- E. Records from Thorlakson Lots UN lot 5, UN lot 6, Lot 1511, Lot 1528
- F. Intercreditor Agreement
- G. Declaration of Tom Thorlakson

Thorlakson's Proof of Claim contains numerous exhibits and is therefore incorporated by reference.

Thorlakson & AgTexas reserve the right to offer any exhibit designated by other parties and present exhibits for rebuttal or impeachment purposes and to offer any documents or pleadings filed in this bankruptcy proceeding.

Thorlakson reserves the right to supplement or amend this list any time prior to the hearing.

Respectfully submitted,

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By: /s/ David L. LeBas

David L. LeBas

**ATTORNEYS FOR AGTEXAS FARM CREDIT  
SERVICES, AGTEXAS, PCA AND  
THORLAKSON DIAMOND T FEEDERS, LP**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic and/or U.S. Mail on April 8, 2024 upon all parties entitled to such notice as provided by the ECF filing system and via first class mail to all creditors.

/s/ David LeBas

David LeBas